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10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

17 Defendants.

18 CASE NO. 3:17-cv-00939-WHA

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**DECLARATION OF FELIPE
CORREDOR IN SUPPORT OF
DEFENDANTS UBER TECHNOLOGIES,
INC. AND OTTOMOTTO LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PORTIONS OF THEIR
PRECIS LETTER REQUESTING
PERMISSION TO FILE MOTION FOR
SUMMARY JUDGMENT**

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
 3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
 4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
 5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Defendants Uber Technologies, Inc. and
 7 Ottomotto, LLC’s Administrative Motion to File Under Seal Portions of Their Precis Letter
 8 Requesting Permission to File Motion for Summary Judgment (the “Administrative Motion”). The
 9 Administrative Motion seeks an order sealing the highlighted portions of Uber’s Precis Letter
 10 Requesting Permission to File Motion for Summary Judgment (“Uber’s Precis”) and of Exhibit 2
 11 thereto, as well as the entirety of Exhibits 3-7.

12 3. The portions of Uber’s Precis and of Exhibit 7 marked in red boxes and the green
 13 highlighted portions of Exhibits 2 and 4-6 contain or refer to trade secret information, which Waymo
 14 seeks to seal.

15 4. Uber’s Precis (portions marked in red boxes in version filed herewith), Exhibits 2 and
 16 4-5 (green highlighted portions), Exhibit 6 (green highlighted portions in version filed herewith), and
 17 Exhibit 7 (portions marked in red boxes in version filed herewith) contain, reference, and/or describe
 18 Waymo’s asserted trade secrets. The information Waymo seeks to seal includes the confidential
 19 design and functionality of Waymo’s proprietary autonomous vehicle system, including its LiDAR
 20 designs, which Waymo maintains as secret. I understand that these trade secrets are maintained as
 21 secret by Waymo (Dkt. 25-47) and that the trade secrets are valuable to Waymo’s business (Dkt. 25-
 22 31). The public disclosure of this information would give Waymo’s competitors access to
 23 descriptions of the functionality or features of Waymo’s autonomous vehicle system. If such
 24 information were made public, I understand that Waymo’s competitive standing would be
 25 significantly harmed.

26 5. Waymo’s request to seal is narrowly tailored to those portions of Uber’s Precis and of
 27 Exhibits 2 and 4-7 that merit sealing.

1 I declare under penalty of perjury under the laws of the State of California and the United
2 States of America that the foregoing is true and correct, and that this declaration was executed in San
3 Francisco, California, on August 21, 2017.

4 By /s/ Felipe Corredor
5 Felipe Corredor
6 Attorneys for WAYMO LLC

7
8 **ATTESTATION**

9 In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this
10 document has been obtained from Felipe Corredor.

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12 By: /s/ Charles K. Verhoeven
13 Charles K. Verhoeven
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